

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 09-00163-CR-W-HFS
	)	
TERRY R. INGERSON,	)	
	)	
Defendant.	)	

**JOINT STIPULATION OF FACTS**

In response to the Court's Order of April 6, 2010 requesting a stipulation of the parties as to the depictions relied on in Count One of the Indictment, the Government and Defendant agree that the following facts are true and correct:

1. The Government's evidence includes videos and images of child pornography created by Defendant and found on Defendant's computer.

2. Video 1 is approximately 7:23 minutes long and is entitled "WOW 2.0." Video 1 begins with Defendant in front of the camera, setting the camera to point toward a dresser in a bedroom. After approximately 2:00 minutes, a 16 year old female appears in the video. The female is wearing a towel on her head and around her body. At approximately 2:37 minutes, the video depicts the female removing the towel and putting on underwear. During this portion of the video the female is standing directly in front of the camera clearly exhibiting her genitalia and breasts. She continues to dress and puts on pants at 3:25 minutes. The video concludes with Defendant entering the room and turning off the camera.

3. Video 2 is an excerpt of Video 1. It is approximately 1.30 minutes long and is entitled "WOW 2.1." Video 2 begins at the point in Video 1 when the female enters the bedroom and

ends after she concludes dressing. It includes the portion of Video 1 depicting the female removing the towel, standing directly in front of the camera and exhibiting her genitalia and breasts.

4. Defendant's computer contained at least 4 still shots of the female exposing her genitalia and breasts. At least two of the still shots were created from Video 1.

5. Video 3 is approximately 20:18 minutes long and is entitled "WOW." Video 3 begins with Defendant in front of the camera, setting the camera to point toward a dresser in a bedroom. After approximately 13:03 minutes, the same female depicted in Videos 1 and 2 enters the frame, again with a towel around her head and around her body. After approximately 14:10 minutes, the female removes the towel and puts on underwear, during which time the female is directly in front of the camera exhibiting her genitalia and breasts. At 15:34 minutes the female puts on a shirt. The video continues until the female leaves the room and, approximately 2:30 minutes later, Defendant enters the bedroom and turns off the camera.

6. Video 4 is an excerpt of Video 3, entitled "OH BOY" and saved in a file entitled "YeHa." The video is approximately 1:28 minutes long. It begins at the point of Video 3 where the female removes her towel, exhibiting her genitalia and breasts, and ends when she puts on a shirt.

7. Defendant's computer contained at least 2 still shots created from Video 3 which depict the female exhibiting her genitalia and breasts.

Respectfully submitted,

Beth Phillips  
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By /s/ Beth Phillips  
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on April 13, 2010, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/ Beth Phillips

Beth Phillips

United States Attorney